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February 15, 2024

VIA ECF

The Honorable Sidney H. Stein  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 9A  
New York, New York 10007

Re: Ayodele v. Avalon Homecare LLC, et al., No. 1:23-cv-09368-SHS

Dear Judge Stein:

We represent Plaintiffs in the above-referenced action and write to respectfully request a final 30-day extension of the deadline to file and serve a motion for default judgment against Defendants from February 20, 2024 to **March 21, 2024** and an adjournment of the initial conference from March 1, 2024 to **April 1, 2024**, or a date convenient for the Court.

Counsel has prepared a lengthy brief in support of Plaintiffs' default motion. However, additional time is needed for each of the clients to review the papers and to confer with counsel about their individual damage calculations and their declarations. Also, one of the clients provided a detailed spreadsheet of their hours worked. Additional time is needed for counsel to review the spreadsheet and confer with the client, and incorporate the data into the brief.

As such, Plaintiffs respectfully request a 30-day extension for their default motion and the initial conference, as described above. Defendants have not appeared in this action. This is the fourth and final request for an extension of this deadline.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Finn W. Dusenbery  
Finn W. Dusenbery

2/16/24  
Application  
granted. IPTC  
adjourned to  
April 4 at 10 AM  
in Ctr 23A  
No further adjournments  
SO ordered.  
Sidney H. Stein  
USDC SDNY